

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendants.

Civil No. 3:20-cv-01747 (PAD)

**BREACH OF CONTRACT; SPECIFIC
PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS
AND EXPENSES**

MOTION TO STRIKE EXHIBIT 8 OF DEFENDANT’S COUNTERCLAIM

TO THE HONORABLE COURT:

COMES NOW, Plaintiff **Teal Peak Capital, LLC** (“TPC” and/or “Plaintiff”) through the undersigned attorney, and respectfully alleges, states, and prays as follows:

1. Defendant filed his Answer to Complaint and Counterclaim on April 7, 2021. *See*, Docket No. 18.
2. As part of his Counterclaim, Defendant included several exhibits. Among them, Defendant included a pleading filed in a Puerto Rico state court, in the Spanish language. *See*, Docket No. 18-8 (Exhibit 8 of the Counterclaim).
3. Defendant failed to submit an English translation of Exhibit 8 upon the filing of the Counterclaim. Even more, Defendant failed to even seek leave to file in Spanish pending an English translation (a routine motion filed in such occasions). *See*, Local Rule 5-C.
4. To the extent that Defendant has failed to either submit a certified translation of Exhibit 8 of the Counterclaim, or to seek leave to file one, Plaintiff hereby moves to strike Defendant’s Exhibit 8 for failing to comply with Local Rule 5-C.

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WHEREFORE, TPC respectfully requests this Honorable Court to grant the motion and consequently strike Defendant's Exhibit 8 of the Counterclaim, at Docket No. 18-8.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 8th day of April, 2021.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

Ferraiuoli LLC

Attorneys for TPC

PO Box 195168

San Juan, PR 00919-5168

Tel.: 787.766.7000

Fax: 787.766.7001

/s/ Jean G. Vidal-Font

Jean G. Vidal-Font

USDC-PR No. 227811

Email: jvidal@ferraiuoli.com